

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.
:
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : 08-13555 (JMP)
:
Debtors. : (Jointly Administered)
:
:
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SUPPLEMENTAL AFFIDAVIT AND DISCLOSURE STATEMENT

OF BRADLEY D. WINE,

ON BEHALF OF DICKSTEIN SHAPIRO LLP

CITY OF WASHINGTON)
) ss:
DISTRICT OF COLUMBIA)

Bradley D. Wine, being duly sworn, upon his oath, deposes and says:

1. I am a partner of Dickstein Shapiro LLP, located at 1825 Eye Street, NW, Washington, DC 20006-5403 (the "Firm").
2. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the "Debtors" and, collectively with their non-debtor affiliates, "Lehman"), and LBHI has retained the Firm provide government contracting-related legal services to it, and in connection with those services, the Firm filed an initial Affidavit and Disclosure Statement on April 24, 2009 at Docket No. 3440 (the "Affidavit") and an Amended Affidavit and Disclosure Statement on April 28, 2009 at Docket No. 3454 (the "Amended Affidavit").
3. In the Amended Affidavit, the Firm undertook to supplement the information contained therein if the Firm should discover any facts bearing on the matters

described therein. The Firm has recently been engaged to represent SkyPower Corp. and certain of its minority shareholders in matters wholly unrelated to the special counsel engagement for LBHI, as described below.

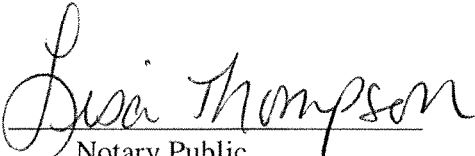
- a. As described in the Amended Affidavit, the Firm represents SkyPower Corp. in certain unrelated matters. LBHI is the indirect owner of approximately 80% of SkyPower Corp. In addition to the matters previously disclosed in the Amended Affidavit, the Firm has recently been engaged to represent SkyPower Corp. in connection with filing and prosecuting a proof of claim against Debtor LBHI asserting certain damages arising from claims for breach of contract and other actions relating to LBHI's direct and indirect (through subsidiaries) investments in SkyPower Corp. The claims are currently unliquidated. These claims are also wholly unrelated to the Firm's special counsel retention by LBHI in this bankruptcy case.
- b. The Firm has also recently been engaged to represent two of SkyPower Corp.'s minority shareholders (6785788 Canada Inc. and 2138747 Ontario LTD) in connection with filing proofs of claim against Debtor LBHI asserting certain damages arising from claims for breach of contract and other actions relating to LBHI's direct and indirect (through subsidiaries) investments in SkyPower Corp. The claims are currently unliquidated. These claims are also wholly unrelated to the Firm's special counsel retention by LBHI in this bankruptcy case.

4. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Affidavit.

By: 

Bradley D. Wine

Subscribed and sworn to before me
this 1st day of October, 2009


Notary Public

Lisa Thompson
Notary Public District of Columbia
My Commission Expires 10-14-10